

General Complaint

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS

Michael Ray Anderson, Ethel Pogue  
vs Estates of Mary Ann Brashear  
+ Columbus Brashear

Case Number : 2:19-CV-76 JRG/RSP

List the full name of each plaintiff in this action.

VS.

SEE Attached List

List the full name of each defendant in this action.  
Do not use "et al".

Attach additional pages if necessary.

I. ATTEMPT TO SECURE COUNSEL:

Please answer the following concerning your attempt to secure counsel.

A. In the preparation of this suit, I have attempted to secure the aid of an attorney as follows: (circle one)

1. Employ Counsel
2. Court - Appointed Counsel
3. Lawyer Referral Service of the State Bar of Texas,  
P. O. Box 12487, Austin, Texas 78711.

B. List the name(s) and address(es) of the attorney(s):

Virginia A. Moore, 6621 Morriss Road, Suite 112, Flower Mound, Tx 75028  
Lone Star Legal Aide, 110 W. College Ave, Ste 802, Tyler, Tx 75702  
Legal Aide of Northwest Texas, 2420 San Jacinto Blvd, Ste 205, Denton, Tx 76205

C. Results of the conference with counsel:

Mrs. Moore gave Referral to another Attorney will look @ 1990 Deed  
Waiting on Response

II. List previous lawsuits:

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action or any other incidents? ✓ Yes        No

B. If your answer to "A" is "yes", describe the lawsuit in the space below.  
If there is more than one lawsuit, attach a separate piece of paper describing each.

1. Approximate file date of lawsuit: \_\_\_\_\_

2. Parties to previous lawsuit(s):

Plaintiff Michael R. Anderson Estate of Mary Ann Brashears

Defendant Shelby Operating Co, Shelby Resources Management, Thomas Woolen

Attach a separate piece of paper for additional plaintiffs or defendants.

3. Identify the court the lawsuit was filed. If federal, name the district. If state, name the county.

Overpayments. U.S. Eastern District Court Marshall, Tx Division

4. Docket number in other court. 2-18-ev-00347.

5. Name of judge to whom the case was assigned.

R. Gilsphreap & Ron S. Payn

6. Disposition: Was the case dismissed, appealed or still pending?

Dismissed

7. Approximate date of disposition. 2/12/2019

III. Parties to this suit:

A. List the full name and address of each plaintiff:

Pla #1 Michael R. Anderson  
2175 S. State Highway 121, A2001  
Lewisville, Texas 75067

Pla #2 Ethel V. Pogue  
2175 S. State Highway 121, A2001  
Lewisville, Texas 75067

B.

List the full name of each defendant, their official position, place of employment and full mailing address.

Def #1: Shelby Operating Company, Shelby Resource Manager  
5535 S.M.U. Blvd Suite 200  
Dallas, Texas 75206

Def #2: Thomas Woodrum  
5535 S.M.U. Blvd Suite 200  
Dallas, TX 75206

Def #3 Tom & Anne Sikes  
8840 Valt Drive  
Tyler, Texas 75773

Attach a separate sheet for additional parties.

Sacquelynne Brashers Robinson  
919 Asper Court  
Dossato, Texas 75115

Euro Resources Inc  
12377 Mont Drive, Suite 1700  
Dallas, Texas 75251

Defendants Addresses:

Tom& Anne Sikes

8240 Yale Drive

Tyler, Texas 75073

Mary Juanita Brashear

4618 Roberts Ave

Dallas, Texas 75215-4425

Charles Dawson

1811 South Blvd # 208

Dallas, Texas 75210

Pamela Tyiska

2004 Silver Springs Drive

Mesquite, Texas 75181

Attorney Mary R Humphrey

4063 Oneida Street

New Hartford, NY 13413

Debra Brashear Howard

1637 Bar Harbor Drive

Dallas, Texas 75232-3017

Greg Boyd

1516 Gillette Street

Dallas, Texas 75217-1211

Estate of Bert Fields JR Executor Michael Haggerty Colter Harris

2323 Ross Ave Suite 600

Dallas, Texas 75211

Hester Miles Jones

3636 Maryland Ave

Dallas, Texas 75216

Westchester Asset Company / *Kim Vaughn Scrivener, Ricky Rutherford*

300 W. Austin Street

Marshall, Texas 75670

Robert Tiller

810 Spur 156

Waskom, Texas 75692

James Tiller III

810 Spur 156

Waskom, Texas 75692

R. Lacy Inc.

222 E Tyler Street

Longview, Texas 75601

Jody Lacy

222 E Tyler Street

Longview , Texas 75601

Spurlock Oil Company

811 Houston Club Building

Houston, Texas 77002

## :NI

State as briefly as possible the fact of your case. Describe how each defendant is involved. Include the names of other persons involved with dates and places. Do not give any legal arguments or cite cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need, attaching additional pages if necessary.

SEE COMPLAINT ALSO

Riley, Joe had a contractual lease with Mary Ann  
Bradshaw. In 1941, In 1948 Riley gave Guts lease only  
to Bert Fielder at that time Bert Fielder added a  
Dil & Gas lease on Columbus Brashers (Mary Ann husband)  
Lease of Dil & Gas & a Pooling lease (Challenging signatures)  
Now Mr. Gutter sent answer stating Mr. Fields had  
legal right to the oil wells. & that the account

from Shelby was correct 1/16/2019. Mr. Haggerty also stated that the old TPA was good from 1978 we ask who was contacted in regards to that he did not give a respond. R. Lacy Tice spoke with their Atty Meredith Todd 1/24/2019 she would not argue if this was of the 1993 old license

from Jeanne Gould Sherry to dwell in the location  
that they had contract of in 4/2005. Only Jacy gave  
the Old Shore of the lot over to Jean Sherry  
there has been no checks doctors in any.

of these attempts with all having overlooking  
fields. 1993 Open fields Shaly + Winchester  
In an agreement with 38.5 + 68 acres. No one  
was contacted with Shaly drilling deeper. 1987  
Winchester + Winchester had a lease

Without any of the signatures of any of the Anderson or Brashear family. They stole the land 5/23/1990 thru fraud. Please read the following complaint: Shelby Operating Company & Shelby Resource Company is the enterprise that has sold land, and make payments to all these entities.



# United States District Court

For the

EASTERN District of Texas

Marshall Division

MICHAEL RAY ANDERSON et al, Ethel Pogue  
Estates of Mary Ann Brashear &  
Columbus Brashears  
VS

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Case No. 19-00076

SHELBY RESOURCES MANAGEMENT,

SHELBY OPERATING COMPANY

TOM WOOLUM, WESTCHESTER ASSET,

KIM VAUGHN SCRIVENER, RICKY RUTHERFORD

ESTATE OF BERT FIELDS JR, ESTATE OF JEANNE FIELDS SHELBY

R. LACY, INC, JODY LACY, MARY JUANITA BRASHEAR et al, DEBRA BRASHEAR HOWARD

GREGG BOYD, JACQUELYNE BRASHEAR ROBINSON, PAMELA TYISKA,

CHARLES DAWSON, HESTER MILES JONES, ROBERT TILLER, JAMES TILLER III

VERDIS GRIFFIN, RUBEN HUBBARD, MARY R HUMPHREYS , EXCO RESOURCES,

SPURLOCK OIL COMPANY, Tom + Anne Sikes

Complaint

TO THE HONORABLE SAID JUDGE:

Title 18 U.S Code 1962 Crimes and Procedure Chapter 96 (4)(5) (a)(b)(c)(d), Penal Code Title 7 Chapter 32 Section 32.01 (1)(2)(a)(b)(c), Chapter 4 Section 32.03, Section 32.22

Thru investigations the course of the case has changed with these fact findings on how all these parties are involved in the dismantling to the 68 acres tract known as the **M D Edwards 68 acres Located: FM 9 & Hearne Street, Border Lake Road, Waskom Texas 75692. 665 William Steele 77 acres Located: FM 9 & Concord Road & Border Ellen George, Waskom, Texas 75692**

#### **FINDINGS:**

On January 2, 1941 Mary Ann Barnes-Brashear entered into an Oil, Gas & Mineral lease for MD Edwards 68 acres tract of land located Waskom, Texas with A.J. Lockett in Harrison County filed into Record Deed January 6, 1941 @ 7:30am and was duly filed on January 7, 1941 @ 10:20 am Vol 244 Pages 272-275.

The same day another page was added this page contained information that R. Lacy, INC. has the lease on the same day. Vol 244 Page 276 Record Deed January 6, 1941 @ 11:00 am. No payments to family has been made of record yet. Mary Ann Barnes Brashear passed away April 17, 1943. Mr. Lacy per their website passed away December 9, 1947. No Release of Lease or Bill of Sale Jody did and Assignment of Overriding Royalties filed on May 13, 2005, Dated April 22, 2005 by Jody Lacy to Jeanne Fields Shelby Vol 3092 Pages 25-254 filed in Harrison County Texas. But record also shows that on April 29, 1993 a correction of a Amended Partial Assignment was made by Jeanne Shelby, Michael H Shelby, Sharon A Shelby, Patrick Shelby & Winchester Production Company, Winchester oil Company for the GAS ONLY lease of Bert Fields at that time they gave Lease to Shelby to drill depths Vol 1339 Pages 737-751 filed in Harrison County Texas on August 23, 1993.

On August 4, 1948 @ 1:35 pm and duly Recorded August 12, 1948 @ 8:00am Bert Fields filed in Harrison County Texas an Oil Gas & Mineral Lease on 665 William Steele Survey 38.5acre tract of land this document dated July 6, 1948 Record Deed 326 Pages 598-602. (Challenging Authenticity)

On August 4, 1948 @ 4:15 pm and duly Recorded August 12, 1948 @ 8:00am Bert Fields filed in Harrison County Texas an Assignment of Gas Rights Under Oil, Gas & Minerals lease Dated July 30, 1948 Vol 612 Pages 377-378 with Mrs. Lacy to receive 1/16<sup>th</sup> overriding royalties of 7/8<sup>th</sup>. (none as the non-participating royalty). No payments from Bert Fields as record shows.

On August 5, 1948 @ 9:45 am and duly Recorded Deed dated August 12, 1948 @ 8:00am Bert Fields filed a Pooling Amendment to Oil. Gas & Minerals in Harrison County Texas Vol 326 Pages 621-624 giving access to both properties 68 acres & 38.5 acres tracts of land (from 1948 to his death and beyond no record of payments still to this dated (Challenging Authenticity).

On May 8 1965 Bert Field Jr ( must of inherited from SR. filed a Release of Oil, Gas and Mineral Lease of the 38.5 acres tract of the 665 William Steel Survey filed in Harrison County Texas Record Deed Vol 612 Pages 377-378 on June 29, 1965 @ 2:50 pm and duly Recorded July 2, 1965 @ 8:00am (he did not release there gas well from the 68 acres M D Edwards only and the pooling amendment giving no access to the Oil & Minerals.) . No payments from still to this date from the 68 acres

On May 25, 1965 R A Whittington entered into an Oil, Gas & Mineral Lease in Harrison County Texas with some members of the Brashear Family. This Lease was One Year Paid Up was done by George Brashear (Unauthorized) family members. (Challenging Authenticity)

On September 27, 1965 @ 1:08 pm Recorded Duly September 28, 1965 @ 8:00am R A Whittington-Davis dated on June 27<sup>th</sup>, 1965 in Harrison County Texas Recorded Deed Vol 616 Pages 279-281 Unit Declaration 77 Acre Unit filed in Harrison County Texas. Following the above lease there was and added

addition Vol 619 Pages 39-46 which shows multiple units for Estate of Bert Fields which there was no knowledge of from family which gives Jeanne Fields Shelby & Bert Fields JR control also. There is No Release of Lease or Bill of Sale.

In 1980 the Brashear Family knew that the Patriot of the family and of the estate was ill and he was already blind some of the family members start to dismantle everything. On March 5, 1980 Jaquelyne Brashear Darthard & Debra Brashear entered in to a Affidavit of Heirship with Spurlock Oil Company Division Order in Houston Texas D/O 5616 & 17252 filed in Harrison County Texas Vol 897 Pages 437-440 filed on April 14, 1890 and recorded April 15, 1980 Record Deed.

On January 7, 1981 the owner of the 38.5 acres and the 68 acres which was given to him after the death of his mother Luberta Brashear Hubbard on February 09, 1958. Upon her death there where 7 siblings remain living which they all knew who Mary Ann gave it to. He was blind and had the most children at the time. 6 months after Leander's death Betty Inez White filed a Affidavit of Heirship Division Order with Spurlock Oil Company in Houston Texas on June 16, 1981 Vol 949 Pages 128-131 it was filed in Harrison County Texas on November 19, 1981 and Recorded November 23, 1981.

On October 19, 1987 Winchester Production Company entered into a Declaration of Unit Steel #1 Gas Unit filed in Harrison County on November 25, 1987 and duly Recorded December 1, 1987 this is for the Gas from Lease with R A Whittington where he is getting oil. This was on going until Sam Vaughn III untimely Death 10/1989. Daughter Kim Vaughan Scrivener took over. No payments still to this date.

In 1988 and 1989. On May 23, 1990 8 months after death of Mr. Vaughn some of the Brashear Family filed Deeds to sell land to Tom Sikes. They are Warranty Deeds from Family members that knew Mary Emma Brashear was the owner of the 77 acres and the 68 acres Deed Vol 1246 pages 681-717. This Deeds was to pay royalties to family. After the knowingly and intentionally they sent documents to Winchester/ Exco to get on the 68 acres to salvage that as well with a fake pooling lease. The only person that was left with land was Hester Miles Jones (How) not Mary Emma's Children

On July 30, 1990 an Amended Declaration of Unit Steel # 1 was filed in Harrison County Texas filed on August 29, 1990 and Recorded Deed Vol 1254 Pages 750 this was filed to stating, **deleted** the lease of the 77 acres 665 William Steele Survey. No Bill of Sale on file. Family where **NEVER** paid royalties as instructed in the so call sale of the land. The Instrument is Filed under Unit Agreement/ Declaration Signation instead of a Release of Lease under Winchester Production Company and being held In Westchester Assets Fraudulently.

On June 18, 1990 Tom Sikes worked for Winchester/ Westchester entered a Mineral Royalty Deed filed in Harrison County, Texas Recorded June 25, 1991 @ 4:19pm to receive 100% the royalties of the 77 Acres, (Ricky Rutherford the notary).

On November 18, 1993 Tom Sikes and (Ricky Rutherford as the Notary.) Entered into a Surface, Mineral & Royalties Deed Limited Warranty filed in Harrison County, Texas on November 30, 1993 it shows (2) 38.5 acres each of the William Steele Survey.

On April 29, 1993 Jeanne Fields Shelby Agency with Michael Shelby, Sharon Shelby, Patrick Shelby Winchester Production Company & Winchester Oil a Schedule Oil, Gas & Mineral Lease the 68 acres lease of M D Edwards it's # 15 on the list Filed August 23, 1993 file a Partial assignment of Lease. Also, correction was filed the same day. The was sent to the family by Thom Woolum as the Lease.

On March 28<sup>th</sup> 1994, Tom Sikes and Anne Sikes entered in a **PAID UP OIL AND GAS** Lease with Land agreement of all land except the 665 William Steele Survey.

On June 29, 2018 Exco Resource entered into Chapter 11 Bankruptcy we have spoken with the Attorneys now Thomas Woolum claim the 68 acres MD Edwards came from them. We have tried to get information regarding the 68 acres. We later learned that thru thorough investigation It was Sold to JSF Agency 2005 and she passed 2012 and her estate of land and oil deed went to Shelby Operating & Resource Management in 2015.

On Several Occasions from 1990 – 2018 Land has been sold without family members signatures. No Bill of Sale on file or Release of Lease or Lien no records only that it has been broken off. And there have been people and companies added to the wells and we don't know where it comes from

#### **ACTUAL FACT FINDING SUMMARY**

Through investigation On January 2, 1941, Mary Ann Brashear entered into an Oil Gas & Mineral contract with A J Lockett of the M D Edwards 68 Acres Tract of land located in Waskom, Texas Harrison County which later to be deceived by him adding a final page that stated the lease will belong to R. Lacy Inc. The company have a fiduciary duty to all their clients. On April 17, 1943 Mary Ann Brashear passed away leaving her children, she then gave the Estate to Luberta Brashear Hubbard since she was the eldest daughter. On December 9, 1947 (per R. Lacy website) Mr. Lacy passed away his wife took over the business. On July 30, 1948, Mrs. Lacy & Mr. Bert Fields Sr. entered into a GAS ONLY assignment lease which Bert Fields Sr was to pay the Brashear Family (no payments noted) he intentionally knowingly breached his fiduciary duties. He has been pumping gas for 71 years by theft never paying royalties until this dated. Which R. Lacy received overriding royalties of the GAS ONLY until this date. R. Lacy was still responsible for the Oil portion of the lease they too by theft breached their fiduciary duties by not paying the Brashear family they realized no payments were made to the Brashear family they intentionally sold the oil portion of the lease after continuously producing oil for 64 years. On August 4, 1948 knowingly & intentionally to commit and Fraudulent offense Mr. Bert Field filed 2 documents with the Harrison County Clerk Office 1) DATED 7-6-1948 was for 665 William Steele Survey Oil, Gas & Minerals of the 38.50 acres (these signatures is not of family members). 2) An Gas Only Lease on the MD Edwards 68 Acres with overriding royalty payments. On August 5, 1948 Mr. Bert Fields Sr Knowingly, intentionally filed another document dated 7-6-1948 for a Pooling Agreement. Mr. Bert Fields Sr Breached his fiduciary duties by filing fraudulent documents and theft for 71 years to this dated no payments have been made to the Brashear Family as known of the Union. As of February 9, 1958, Luberta Hubbard passes away leaving to control the both Estates is Leander Brashear her 1 and only child. Mr. Leander became blinded at the age of 22. In 1963 Mr. Bert Fields Sr passes away leaving Estate to his son and daughter Bert Fields Jr & Jeanne Fields Shelby. On May 8, 1965 Bert Fields Jr files a Release of Lease on the 665 William Steele Survey 38.50 acres, but not the 68 acres for the gas only. (Now through a report that Mr. Bert Fields Jr Atty Colter Harris sent it show that the wells did not start to produce will again until 1978 on 68 acres and was receiving oil royalties as well still no payments from the Estate of Bert Fields which his son or daughter is handing the estate they have not yet to send royalties. Mr. Colter Harris was then sent a copy of the Gas Only lease which at the time the end the contracts. In 1965 some of the Brashear family members did a 1 year paid up lease with R A Whittington the 77 Acres Block 4 and 5 Belonging to Columbus & Anthony Brashear. Unknow about royalties he

passed away 2018 and we have made contact with his Atty that's handling his estate as it stand no payment 54 years. There is a lease dated 1965 that added Jeanne Fields Shelby to the 77 acres. In 1987 Winchester Production Company A lease for Steel Well # 1 in stayed in effect until his untimely death in October 1989. During 1980 -1990 The Brashear family knows that Leander passed and now Berlained Brashear was the oldest son he is a Dallas County Judge Berlained Brashear. The family started trying to get on access to the land by filing fraudulent documents knowingly and intentionally to get by and sale Both estates. Not letting the Heirs of Leander know was going on. So, in 1980 Before Leander passed Jacquelyne and her sister Debra filed a fraudulent document with Spurlock oil followed her was Descendants of Georgia Mae Boyd, Descendants of Zephyr Hubbard's they filed Affidavits of Heirship with Sprurlock Oil company then Jacquelyne sold her royalties, after that they did a pooling agreement in attempt to get royalties. In 1989 28 members filed Warranty Deed in Harrison County they conspired along with Tom Sikes & Kim Vaughn Scrivener, Rick Rutherford to sell 77 acres tract of land Block 4 & Block 5 belonging to Columbus & Anthony Brashear. The warranty deed stated that once land was sold you will still receive royalties. They fraudulent, knowingly intentionally conspired to ended the Royalty deed so it and they used Mary Emma Anderson name to do it she later died of Lupus complication and the family knew of her sickness and that her father left her everything. There was no intention of paying royalties on to get rid of the land by conspiracy fraud, theft, embezzlement as of this day it sets in the Westchester Asset. Tom Sikes filed a theft deed to get 100% of the royalties right after they got the land. In October 2012 Mary Juanita Brashear and her family filed fraudulent documents with the Harrison County Clerk office to fraudulently give the access to the land and steal royalties thru her marriage thru Howard Brashear and he was entitled to it. Tom Woolum was notified of this and still conspired to give them royalties anyway he was told by several family members they were not entitled to it. Some Brashear Family never told Leander family what happen with the 38.5 acre they found out thru research. Shelby Operating & Shelby Resources has conspired, knowingly, intentionally conspire to dismantle the 68 acres since 2005 this was done conspiring by the help of Hester Miles Jones & Mary R Humphrey, Charles Dawson, Tom Woolum, Michael H Shelby none of the Leander Brashear grandchildren have signed off to anything while still being under JFS . In 1993 to drill depths, R. lacy claims was unaware because the oil lease was still in there position. In 2018 Debra Howard Brashear attempting to conspire with Tom Woolum tell him that her sister Jacquelyne sold her royalties and was getting more. And to Fraudulent, knowingly to add names one name of people not entitle and ask for reimbursement of tax money. All in collusion of misconduct criminal activities :A, J Lockett R. Lacy INC., Bert Fields Sr, Bert Field Jr, Jeanne Fields Shelby, Michael H Shelby, Thomas Woolum, Kim Vaughn Scrivener, Ricky Rutherford, and all Defendants above As you can see all these people had a hand in these organization to Sell, Steal, Not Pay Royalties through, fraud, theft, embezzlement all knowingly and intentionally. All these people are being paid by Shelby Resource Company as of this day continuing to get royalties that they know they are not entitled to. There are 751 payments on the M D Edwards and the Brashear Family wells there is no reason for Westchester Asset and the Vaughn Family Trust to receive royalties from the Brashear Family other to get the LAND HELD IN TRUST. Some are individuals and other companies, most are Trust companies. Tom Woolum of Shelby has been ask to produce documents he refuse to do so, Ricky Rutherford, Tom Sikes POA Anne Sikes, Westchester Asssets have been ask to produce documents, R. Lacy, INC. Exco Bert Fields. Tom has stated that all the surface land has been partitioned out but there is not proof of such. All of these companies have worked together for yours and for years the passed around the Brashear land to in such that each get there share. Not notifying family members of problems and concerns. Each of these companies have not up held the Fiduciary

Duty instead, committed Fraudulent Concealment, Fraud, Deceit, Cheated, Manipulated, Theft, Embezzlement, themselves into ownership of the land royalties. This is Organized Criminal Activities. This is and Association-In-Fact Enterprise they have a Formal, ascertainable Structure. This is the process by not paying royalties or paying small amounts and getting you to sellout this is ongoing this is created intentionally. I have established association in the documents above they all have continuing connection thru royalty payments that they received from Shelby Operating Company and business deals each have Overriding Lease.

The plaintiff ask that the court find all defendant guilty in the Organized Criminal Activities and that the family be granted all the land back 38.50 acres and the 68 acres. Each company and their lease be no long exit and all due royalties from each company that has Breached their Fiduciary Duties thru these Criminal Activities. Thru these activities it has brought great mental, physical, and emotional damages to the Anderson Family. Mr. Anderson has been homeless, loss sentimental valuables that are irreplaceable. He has gotten hurt doing new work that was unfamiliar to him cause him permanent bodily damages that has severely impact Mr. Anderson quality of life where he could have lost his life. Other family members in need of severe medical attention mental, emotional stress.

Plaintiff's seeks Compensatory Damages based on fact finding and misconduct of multiple defendants in the amount of 10,000,000.00.

Plaintiff seeks General Damages 30,000,000. 00 for the Anderson Family pain suffering mental anguish any future medical, loss of income, loss of consortium.

Plaintiff seek Punitive Damages maximum Texas state law cap.

We Pray that the court to change the earlier complaint to Racketeer Influenced and Corrupt Organization thru thorough due diligence I believe all crimes should be tried in the court of law. Overpayment as was stated in the initial complaint. I found through research I have found Fraud, Larceny, Embezzlement between the 3 entities and people added to the list of defendants that are involved. Under the RICO Act *Rotella v Wood et al feb,2000* the Shelby Operating Company has conspired to pay the owners less money so that they can maximize their ownership and profits. RICO makes it criminal "to conduct" an "enterprise's affairs through a pattern of racketeering activity," 18 U. S. C. § 1962(c). A "pattern" requires at least two acts of racketeering activity, the last of which occurred within 10 years after the commission of a prior act. § 1961(5). A person injured by a RICO violation may bring a civil RICO action. § 1964(c). Since there is no statute of limitation on the civil RICO ACT. I have just found out this information since filing the initial complaint. I have just found my total injury and the pattern of racketeering activity. I can prove the case. I like to upgrade case to the RICO ACT.

Michael Ray Anderson

2175 S State Highway 121, A2001

Lewisville, Texas 75067

Ph:214-780-6763 or 214-284-7785

*Pro Se'*

- V. Relief: State Briefly exactly what you want the court to do for you. Make no legal arguments and do not cite cases or statutes. Attach additional pages if necessary.

WE ask the court to Follow the Rules Under  
Civil Rico to grant us 3x times the awarded  
Amount, we ask the court to have all attorney  
fees payed for by the defendants. We  
ask to court to award our land back  
that was unlawfully taken from our family  
We want justice

Signed this 1<sup>st</sup> day of March, 20 19.  
(Month) (Year)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I declare (certify, verify or state) under penalty of perjury that the foregoing is true and correct.

Executed on: March 1, 2019  
Date

Michael R. Anderson  
Etzel V. Pogue

Subscribed and sworn to before  
me this 1 day of March, 2019  
[Signature]  
Notary Public

Signature of each plaintiff

